EXHIBIT 79

SECOND MAO DECLARATION

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

MATERIAL SOUGHT TO BE SEALED

1   UNITED STATES DISTRICT COURT

2   NORTHERN DISTRICT OF CALIFORNIA

3   SAN FRANCISCO

4   --oOo--

5   ANIBAL RODRIGUEZ, et al.,

     individually and on behalf of

6   all other similarly situated,

7   Plaintiffs,

8   vs.   Case No.

                                      3:20-CV-04688

9   GOOGLE LLC, et al.,

10   Defendants.

     _____/

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12

13   HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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16   VIDEO-RECORDED DEPOSITION OF JOHN R. BLACK, Ph.D.

17   SAN FRANCISCO, CALIFORNIA

18   FRIDAY, JULY 14, 2023

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23   Reported by:

24   Anrae Wimberley, CSR No. 7778

25   Job No. 5996166

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

1   MR. SANTACANA: You're asking about the button?   02:35:03

2   MR. MAO: Yeah, because he's -- well, those are

3   his words.

4   MR. SANTACANA: I'm just, you know, I'm just

5   clarifying.   02:35:08

6   THE WITNESS: If I am Google and I am allowed

7   to keep a copy of your web activity and your app

8   activity, and I'm able to store it in your Google

9   account and have access to that, then when I go to

10 serve personalized ads to you, I cannot only use all   02:35:27

11 the data sources over here that are valued under GAP

12 regardless of sWAA, but I also can go look at that

13 storage of record of information that I just

14 described from your Web & App Activity data and I

15 can say, Oh, Mr. Mao is interested in skiing and   02:35:46

16 race cars, and I've stored all that, and now I can

17 serve you ads that are personalized based on your

18 Web & App Activity.

19   If you turn that off, I, Google, am no

20 longer to save that information in your Google   02:35:59

21 account, and when I go to personalize ads for you, I

22 can still look at what kind of phone you have or

23 other information that's not part of your Web & App

24 Activity, I cannot personalize based on that

25 other -- those other data sources, but I don't have   02:36:17

                                                    Page 138

1   any information stored in your Google account that I   02:36:20

2   can look to to try and give you a better ad

3   experience -- personalized ad experience.

4   BY MR. MAO:

5   Q.   So is my account then just for the   02:36:26

6   personalization of ad experiences?

7   MR. SANTACANA: Misstates prior testimony,

8   also, vague and lacks foundation.

9   THE WITNESS: Your account is your relationship

10   with Google; right?   It has your user name and your   02:36:38

11   e-mail and your password and all kinds of other

12   information that Google keeps that is associated to

13   your identity, including, with permission, your Web

14   & App Activity data.

15   That one piece can be turned off with this   02:37:02

16   button.   You can say, I don't want first-party

17   information stored on my account or I do but I don't

18   want third-party information stored in my account.

19   That's one control you have of all the data in your

20   account that you can manage manually with a switch.   02:37:22

21   BY MR. MAO:

22   Q.   Got it.   Okay.

23   So you realize that -- actually, strike

24   that.

25   So when we embarked on this, we were   02:37:36

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1	originally talking about the buttons on -- sorry,	02:37:38
2	about the ability to do attribution at the end of,	
3	in my mind, how app promo -- the work will flow from	
4	app promo kind of happens.	
5	But what about for non-app promo ads on	02:38:02
6	mobile apps delivered by Google, what is your	
7	understanding as to how the attribution model works	
8	there?	
9	MR. SANTACANA: Vague.	
10	BY MR. MAO:	02:38:21
11	Q. Let's use your analogy of -- I think you	
12	called them "display campaigns."	
13	MR. SANTACANA: Asked and answered.	
14	THE WITNESS: So for a display campaign, AdMob	
15	let's take as an example --	02:38:36
16	BY MR. MAO:	
17	Q. Yeah.	
18	A. -- would go to the ad network and say, I	
19	have this much space in this format available. The	
20	ad network would give a display ad to the device.	02:38:49
21	It would display the display ad in front of the user	
22	holding that device. That's an ad impression.	
23	That's already an adEvent.	
24	If the user clicks, that's another	
25	adEvent.	02:39:11